Cobre Valley Community Transit Title VI Implementation Plan

2016

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Executive Summary

The Cobre Valley Community Transit ("CVCT") system was started in 1987. The Town of Miami manages the ADOT contract transport system as a demand-response or dial-a-ride program.

In 2009 a five year plan was developed to service the local communities expanding ridership with additional vehicles and drivers indicating the need for a deviated fixed route system. In 2011 a consulting firm was assigned to help update the five year plan with focus on a fixed route system. In August 2012 the operating Budget was approved. In 2013 The first Deviated Fixed Route Buses began running two routes which still run today. DAR also continues to run. In 2015, management staff was added to streamline the efficacy of both DAR and the Fixed Route. In February 2015 CVCT experienced an Audit to help further streamline ridership, improve maintenance and solidify drivers concerning rules, procedures and dealing with senior and the disabled riders. In May 2015, CVCT received the results of the ADOT audit and has worked since then to improve the audit results.

Title VI Policy Statement

The Cobre Valley Community Transit policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that "no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any Cobre Valley Community Transit sponsored program or activity. There is no distinction between the sources of funding.

Cobre Valley Community Transit also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, Cobre Valley Community Transit will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Cobre Valley Community Transit distributes Federal-aid funds to another entity/person, Cobre Valley Community Transit will ensure all subrecipients fully comply with Cobre Valley Community Transit Title VI Nondiscrimination Program requirements. The Town Manager has delegated the authority to Joseph Heatherly, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Joseph Heatherly, Town Manager

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Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA Cobre Valley Community Transit

Cobre Valley Community Transit operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Cobre Valley Community Transit.

For more information on Cobre Valley Community Transit's civil rights program, and the procedures to file a complaint, contact Transit (928)473-8222,; email miamitransit@cableone.net; or visit our administrative office at 500 W Sullivan Miami, Arizona 85539. For more information, visit www.miamiaz.gov.

A complainant may file a complaint directly with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: <u>ADOT</u>: ATTN: Title VI Program Manager 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 <u>FTA</u>: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact (928) 473-4403. Para información en Español llame: Miami Town Hall (928) 473-4403

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA Cobre Valley Community Transit

Cobre Valley Community Transit (y sus subcontratistas, si cualquiera) asegura complir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o pais de origen.

Para obtener más información sobre la Cobre Valley Community Transit's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Transit Coordinator, (928) 473-8222; o visite nuestra oficina administrativa en 500 W Sullivan St Miami, Arizona 85539. Para obtener más información, visite www.miamiaz.gov.

El puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ADOT: ATTN Title VI Program Manager 206 S. 17th Ave MD 155A Phoenix AZ, 85007 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations: Miami Town Hall, Miami Transit Office, Miami Senior Center, Miami Library, and Town website www.miamiaz.gov.

This notice is posted online at www.miamiaz.gov.

6 Non Discrimination Notice to the Public -Spanish/ Title VI Implementation Plan

Non Discrimination Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by Cobre Valley Community Transit, including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted Cobre Valley Community Transit will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by Cobre Valley Community Transit or submitted to the State or Federal authority for guidance.

- (7) Cobre Valley Community Transit will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at civilrightsoffice@azdot.gov.
- (8) Cobre Valley Community Transit has 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 7 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 7 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Discrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.
- (10)A copy of either the closure letter or LOF must be also be submitted to ADOT within 72 hours of that decision. Letters may be submitted by hardcopy or email.
- (11)A complainant dissatisfied with a Cobre Valley Community Transit decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: <u>ADOT</u>: ATTN ADA/Title VI Program Coordinator 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 <u>FTA</u>: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington, DC 20590
- (11)A copy of these procedures can be found online at: www.miamiaz.gov.

If information is needed in another language, contact Town Administration at (928) 473-4403. Para información en Español llame: Town Administration (928) 473-4403.

Discrimination Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):	Telephone (Work):			
Electronic Mail Address:	•			
Associate Format Bossinomonto?	☐ Large Print		☐ Audio Tape	
Accessible Format Requirements?	☐ TDD		☐ Other	
Section II:		•		
Are you filing this complaint on your own be	ehalf?	□Yes*	□No	
*If you answered "yes" to this question, go t	o Section III.	-		
If not, please supply the name and relations	hip			
of the person for whom you are complaining	g			
Please explain why you have filed for a third	party:			
Please confirm that you have obtained the p	permission of the	□Yes	□No	
aggrieved party if you are filing on behalf of	a third party.			
Section III:	<u> </u>		-	
I believe the discrimination I experienced wa	as based on (check a	III that apply)	:	
☐ Race ☐ Color ☐ National Origin ☐ Disability				
Date of Alleged Discrimination (Month, Day,	, Year):			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
Section VI:				
Have you previously filed a Discrimination co	omplaint with this	□Yes	□No	
agency?				

If yes, please provide any reference in	nformation regarding your previous complaint.
	
Section V:	<u> </u>
Have you filed this complaint with an	y other Federal, State, or local agency, or with any Federal
or State court?	
☐ Yes ☐ No	
If yes, check all that apply:	
☐ Federal Agency:	
	☐ State Agency:
☐ State Court :	☐ Local Agency:
Please provide information about a co	ontact person at the agency/court where the complaint
was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI:	
Name of agency complaint is against:	
Name of person complaint is against:	
Title:	
Location:	
Telephone Number (if available):	
You may attach any written materials	s or other information that you think is relevant to your
complaint. Your signature and date a	are required below
Signature	
_	the address below, or mail this form to:
·	
Cobre Valley Community Transit, Transit	t Coordinator
500 W Sullivan Street	
Miami, Arizona. 85539	
(928) 473-8222	

A copy of this form can be found online at www.miamiaz.gov

Discrimination Investigations, Complaints, and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

Description/Name	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin or disability)	Status	Action(s) Taken (Final findings?)
Investigations				
1)	•			
2)				
Lawsuits				
1)				
2)			_	
Complaints				
1)				
2)				

Cobre Valley Community Transit had one ADA complaint and investigation but no Title VI Discrimination complaints or investigations in 2015. No ADA or Title VI lawsuits were filed against Cobre Valley Community Transit in **2015**.

Cobre Valley Community Transit

Cobre Valley Community Transit engages the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process through public meetings and/or surveys. As an agency receiving federal financial assistance, Cobre Valley Community Transit made the following community outreach efforts:

Town of Miami Town Council meetings are held on the second and fourth Mondays of each month. Notice of meetings and other public information are provided through the newspaper, local radio stations, regular local governments posting locations and the Town of Miami website. Notice is provided at least 24 hours prior to every public meeting being held.

In the upcoming year Cobre Valley Community Transit will make the following community outreach efforts:

Public Meetings:

- (1) Public meetings are scheduled periodically to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.
- (2) When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.
- (3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

Cobre Valley Community Transit submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

Cobre Valley Community Transit

Limited English Proficiency Plan

Cobre Valley Community Transit has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Cobre Valley Community Transit services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the Cobre Valley Community Transit's extent of obligation to provide LEP services, Cobre Valley Community Transit undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

 The number or proportion of LEP persons eligible in the Cobre Valley Community Transit service area who may be served or likely to be encounter by Cobre Valley Community Transit program, activities, or services;

According to the Census Bureau's Population Estimates Program;

	Estimate	Area	Estimate	Area
Speak English less than "very well"	463	Globe	142	Miami

Translation services will be available for any other LEP languages either orally or in writing upon request.

 The frequency with which LEP individuals come in contact with Cobre Valley Community Transit services;

Based off the census bureau information the frequency in which LEP individuals come in contact with CVCT is likely high.

3) The nature and importance of the program, activities or services provided by Cobre Valley Community Transit to the LEP population; and

The nature of the LEP users for medical, shopping, access to food and bill paying and social interaction is of high importance to the LEP community. All service areas we provide and

4) The resources available to Cobre Valley Community Transit and overall costs of providing LEP assistance. A brief description of these considerations is provided in the following section.

Current resources available to the LEP Spanish speaking community include Town hall staff that provides verbal and written translation services in Spanish

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested. Translation services will be available for any other LEP languages either orally or in writing upon request.

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

Safe Harbor Provision

Cobre Valley Community Transit complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings



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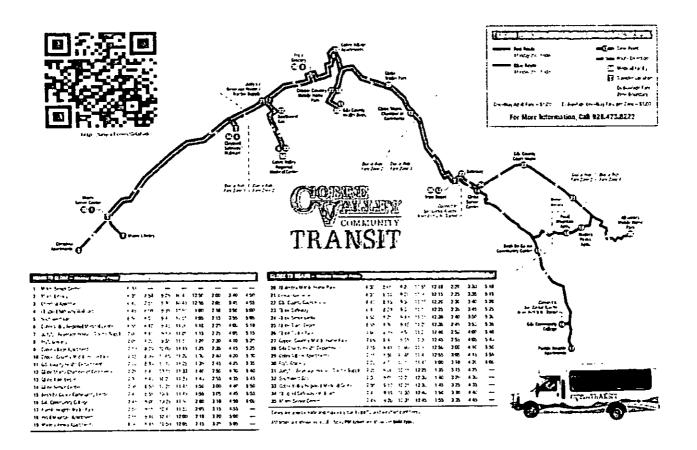
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Non-elected Committees Membership Table

A subrecipient who selects the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Population	TYPE %	TYPE %	TYPE %	TYPE %	TYPE %
	HERE%	HERE%	HERE%	HERE%	HERE%
TYPE THE					
NAME OF THE	TYPE %	TYPE %	TYPE %	TYPE %	TYPE %
COMMITTEE	HERE%	HERE%	HERE%	HERE%	HERE%
HERE					
TYPE THE					
NAME OF THE	TYPE %	TYPE %	TYPE %	TYPE %	TYPE %
COMMITTEE	HERE%	HERE%	HERE%	HERE%	HERE%
HERE					
TYPE THE			T		
NAME OF THE	TYPE %	TYPE %	TYPE %	TYPE %	TYPE %
COMMITTEE	HERE%	HERE%	HERE%	HERE%	HERE%
HERE					

[☐] Cobre Valley Community does NOT select the membership of anytransit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

X Cobre Valley Community Transit does NOT monitor subrecipients for Title VI compliance.

Title VI Training

Title VI training is included in the PASS/ START training every driver must complete after hire. Refreshers are given out throughout the year in the 2 the Point Packets.

Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. "Facilities" in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Cobre Valley Community Transit has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements have been developed since 2013.

Board Approval for the Title VI Program

Town of Miami Resolution No. 1186. Approved October 10, 2016.

Organizational Chart

Miami Town Council Mayor Darryl Dalley Vice Mayor Don Reiman

Councilwoman Rosemarie Castenada - Councilman Mike Black _ Councilman Angel Medina Councilman Sammy Gonzales _ Councilwoman Susan Hanson

